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September 19, 2022

**VIA CM/ECF**

The Honorable Judge Christine P. O' Hearn  
Mitchell H. Cohen Building & U.S. Courthouse  
4th & Cooper Streets, Room 1050  
Camden, New Jersey 08101

**Re: Gandy et al. v. City of Millville, et al.  
Civil Action No. 1:20-CV-641-CPO-AMD**

Your Honor:

As you may be aware, this firm represents Plaintiffs the Estate of Edward C. Gandy Jr. and Shane S. Gandy ("Plaintiffs") in the above referenced matter. Currently pending before Your Honor is a motion to dismiss with a scheduled return date of October 3, 2022. Per L.Civ.R. 7.1, Plaintiffs respectfully requests that this motion be adjourned to the next available motion day of October 17, 2022. The originally noticed motion day has not previously been extended or adjourned. At the case management conference today, the attorney for one of the new defendants indicated she was going to file a similar motion to the one pending in the next day or two, so this requested adjournment would not delay this matter.

Thank you for your time and consideration, and please feel free to have a member of your staff contact me with any questions or concerns.

Respectfully,  
SMITH + SCHWARTZSTEIN LLC

/s/ Andrew Smith  
By: \_\_\_\_\_  
Andrew B. Smith, Esq.

cc: Counsel of Record